

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Sections 90.20 and 90.175 of the)	
Commission's Rules for Frequency Coordination)	WT Docket No. 02-285
Of Public Safety Frequencies in the Private Land)	RM-10077
Mobile Radio Below 470 MHz)	

NOTICE OF PROPOSED RULEMAKING

Comments of the
State of Wisconsin
Department of Transportation

The State of Wisconsin supports the proposal to introduce competitive frequency coordination in the Public Safety Pool. The reasons for our support include improved speed of service, reduced costs, and to allow applicants to choose the best source for service.

The Bureau of Communications in the Wisconsin Dept. of Transportation, having several APCO and FCCA members, and being a member of AASHTO, represents highway maintenance, law enforcement, forestry conservation, fire control, and emergency medical communications interests for state and local agencies throughout Wisconsin. We will provide comments on a number of the issues raised by the FCC in this docket.

The FCC asked whether all of the coordinators are now representative of all the users in the Public Safety Pool below 512 MHz. We believe that APCO is representative of all public safety users. Other coordinators would appear to be less so, however, it appears that they are currently coordinating applications from most public safety disciplines.

We note that APCO has provided coordination for all public safety disciplines for many years as the coordinator of the old Local Government Radio Service. Additionally, APCO has represented all public safety interests as a leader in the efforts toward the allocation of sufficient spectrum for public safety communications.

It appears that being representative of a particular niche of users is no longer a requirement for Business/Industrial Pool coordinators. With all public safety coordinators providing coordination for the old Local Government Radio Service frequencies, it appears that representative-ness is no longer a requirement for the Public Safety Pool either.

Sharing of frequencies between coordinators is fairly common, however, the existing concurrence process tends to hinder the sharing of frequencies due to the increased cost to coordinate frequencies that require approval from multiple coordinators.

We believe that all public safety coordinators are qualified to coordinate SERS frequencies. SERS frequencies are no more difficult to coordinate than any others in the Public Safety Pool. We believe that PCIA is not representative of public safety and should not coordinate other Public Safety frequencies.

There is little difference between applications and licensing in the Public Safety Pool below 470 MHz and the frequencies formerly allocated to the Local Government Radio Service. The process and environment are virtually the same. In the 700 and 800 MHz bands there is some difference due to the involvement of regional planning groups and because many of those assignments are exclusive.

We believe that same day electronic notification to other coordinators and a five day comment response period are necessary to avoid problems with competitive coordination.

We do not believe that all coordinators are proficient in the plans of all public safety user groups, however, this may not be a significant problem as most public safety "plans" involve statewide operations that can be identified in FCC database searches. There are many active state level public safety plans. Wisconsin has approximately 35 frequencies that are part of statewide and national public safety plans.

A contour overlap approach may provide some safeguards but may not protect many statewide licenses. Actual coverage studies provide better information and a more valid basis for frequency coordination decisions. Contour studies would likely be required for most applications in congested areas and not lead to better coordinations but repetitive circulations of the same application. Adjacent channel considerations should be included in any contour overlap approach.

The open coordination of most frequencies in the Business/Industrial Pool has been successful in providing for a choice in coordinators and competitive pricing.

In summary, we believe that competitive coordination will overall be beneficial to public safety communications provided that good data exchange procedures and comment periods are employed.

Respectfully submitted,

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Director
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